

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

League of United Latin American)	
Citizens, et al.,)	
<i>Plaintiffs,</i>)	
)	
Eddie Bernice Johnson, <i>et al.</i> ,)	
<i>Plaintiff-Intervenors,</i>)	No. 3:21-cv-259-DCG-JES-JVB
)	[Lead Case]
)	
v.)	
)	
Greg Abbott, in his official)	
capacity as Governor of the State)	
of Texas, et al.,)	
<i>Defendants.</i>)	
)	

United States of America,)	
<i>Plaintiff,</i>)	
)	
v.)	No. 3:21-cv-299-DCG-JES
)	[Consolidated Case]
State of Texas, <i>et al.</i>)	
<i>Defendants.</i>)	
)	

**NON-PARTIES TEXAS LEGISLATIVE COUNCIL AND JEFFREY
ARCHER'S UNOPPOSED MOTION TO EXTEND THE DEADLINE TO
COMPLETE THE DEPOSITION OF JEFFREY ARCHER**

Non-Parties Texas Legislative Council (“TLC”) and Jeffrey Archer request an extension of their deadline to provide Mr. Archer for deposition pursuant to the Court’s August 23, 2022 Order (Dkt. 557). The United States does not oppose this motion.

On August 23, 2022, the Court denied TLC and Mr. Archer’s motion to quash the United States’ deposition subpoena for Mr. Archer and denied the alternative motion for protective order, thereby allowing the United States to depose Mr. Archer in accordance with the procedures outlined in the Order. *Id.* at 12. The Court ordered the parties to agree on a mutually convenient date to proceed with the deposition, but ordered the deposition occur no later than 14-days after the issuance of the Order. *Id.*

Mr. Archer’s deposition was scheduled September 6, 2022, within the 14-day timeframe ordered. However, counsel for Mr. Archer, Assistant Attorney General Alyssa Bixby-Lawson, has been selected for a jury panel, to start on September 6, 2022. Accordingly, TLC and Mr. Archer request a limited extension of the deadline to proceed with Mr. Archer’s deposition until after Ms. Bixby-Lawson’s jury service. TLC and Mr. Archer have agreed to provide alternative dates for Mr. Archer’s deposition to take place within 14-days after Ms. Bixby-Lawson’s jury service ends. TLC and Mr. Archer do not seek an extension to delay these proceedings, and an extension will not prejudice the United States.

For the foregoing reasons, non-parties Texas Legislative Council and Jeffrey Archer respectfully request that their unopposed motion be granted, and that the deadline for Mr. Archer's deposition be postponed at this time.

Dated: August 31, 2022

Respectfully submitted.

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

LESLEY FRENCH
Chief of Staff

JUSTIN GORDON
Interim Division Chief
Financial Litigation and Charitable Trusts
Division

/s/ Alyssa Bixby-Lawson

ALYSSA BIXBY-LAWSON
Assistant Attorney General
State Bar No. 24122680
Financial Litigation and Charitable Trusts
Division
Office of the Attorney General
P.O. Box 12548 (MC 017)
Austin, TX 78711-2548
Tel: (210) 270-1118
Division Fax: (512) 477-2348
Alyssa.Bixby-Lawson@oag.texas.gov
Counsel for Non-Parties
Texas Legislative Council and Jeffrey Archer

CERTIFICATE OF CONFERENCE

I certify that counsel conferred with counsel for the United States regarding the subject of this motion. Counsel for the United States indicated he does not oppose the requested relief.

/s/ Alyssa Bixby-Lawson
Assistant Attorney General

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2022, the foregoing *Non-Parties Texas Legislative Council and Jeffrey Archer's Unopposed Motion to Extend the Deadline to Complete the Deposition of Jeffrey Archer* was electronically filed with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Alyssa Bixby-Lawson
Assistant Attorney General